

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

JENNIFER BOUGHTON,	:	Case No. 1:19-cv-154
	:	
Plaintiff,	:	Judge Douglas R. Cole
	:	
v.	:	
	:	
WILLIAM BARR, ATTORNEY	:	PLAINTIFF'S UNOPPOSED MOTION
GENERAL OF THE UNITED STATES,	:	TO FILE EXHIBITS AND AFFIDAVIT
	:	<u>UNDER SEAL</u>
Defendant.	:	

Plaintiff Jennifer Boughton respectfully moves this Court to file exhibits to Tiffany Baker's deposition and Elizabeth Newman's Affidavit in Support of Plaintiff's Memorandum in Opposition to Defendant's Motion for Summary Judgment in this matter under seal. As grounds for this Motion, Plaintiff states that the Baker deposition exhibits and the documents accompanying Ms. Newman's Affidavit contain confidential and/or proprietary information covered by the Stipulated Protective Order agreed to by the parties and entered by the Court on April 21, 2021 (Doc #24). Defendant's counsel has been contacted about the alternative of redactions, but in light of the nature of the information sought to be used, Plaintiff seeks leave to file under seal at Defendant's behest.

Plaintiff therefore respectfully requests that the Court grant this Motion and enter the attached proposed Order.

Respectfully submitted,

/s/ Elizabeth Asbury Newman

Elizabeth Asbury Newman (0096921)

Jon B. Allison (0073955)

Trial Attorneys for Plaintiff

FREKING MYERS & REUL LLC

600 Vine Street, 9th Floor

Cincinnati, OH 45202

(513) 721-1975/Fax: (513) 651/2570

enewman@fmr.law

jallison@fmr.law

CERTIFICATE OF SERVICE

I hereby certify that on August 17, 2021, a copy of the foregoing was filed electronically using the Court's CM/ECF system. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system and copies will be mailed via U.S. mail, e-mail and/or facsimile to those parties who are not served via the Court's electronic filing system. Parties may access this filing through the Court's System.

/s/ Elizabeth Asbury Newman